



Anti-Slavery and Human Trafficking Policy

1. Purpose

D&G Builders and Joiners Limited is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or our supply chain. This policy outlines our commitment to act ethically and with integrity, implementing systems and controls that prevent modern slavery within our operations and uphold human rights across our business activities.

2. Scope

This policy applies to all employees, contractors, subcontractors, suppliers, and other business partners working with or on behalf of D&G Builders and Joiners Limited.

3. Definitions

- Modern Slavery: Encompasses forced labour, debt bondage, forced marriage, and human trafficking, where individuals are exploited through coercion, fraud, or deception.
- Human Trafficking: The illegal movement of individuals by means of force, fraud, or coercion to exploit them through forced labour, slavery, or servitude.

4. Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

While we recognise that the UK construction sector is widely considered to be at high risk for modern slavery and worker exploitation, as the industry relies on complex supply chains, subcontracting and temporary labour which created vulnerabilities or workers and increases the risks of exploitation. D&G Builders and Joiners Ltd (the Company), have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships. We are committed to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains. We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

The Company's suppliers provide materials and are generally large organisations, we are satisfied that we have contingency due to having a variety of suppliers for the same category.

We expect the same high standards from all our contractors, suppliers and other business partners, and as part of our contracting processes, specific prohibitions against the use of forced, compulsory

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or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

We ensure that all members of staff have written contracts of employment and will seek to ascertain whether any of our staff have had to pay any fees to obtain work. On or before the first day of employment, we conduct sufficient right to work checks and have evidence that the appropriate checks have been made.

We have identified that a sign of exploitation is where a number of employees working for a company have the same address, and our managers are aware of this red flag and will ensure that any risks are reported to the Directors.

This policy applies to all persons working for us or on behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment, and we may amend it at any time.

5. Responsibilities

1. **Management:** Senior management is responsible for ensuring that policies and procedures are in place to prevent modern slavery and for promoting awareness throughout the organisation.
2. **Employees:** All employees are expected to report any suspected case of slavery or human trafficking and to understand and follow this policy.
3. **Suppliers and Partners:** We expect all third parties connected to our business to uphold the same zero-tolerance approach to modern slavery and human trafficking.

6. Procedures and Due Diligence

To prevent modern slavery, D&G Builders and Joiners Limited commits to the following procedures:

- **Risk Assessment:** Regularly assessing the risk of modern slavery within our operations and supply chains, focusing on high-risk areas such as labour recruitment and raw materials sourcing.
- **Supplier Due Diligence:** Conducting thorough due diligence when onboarding suppliers, including:
 - Requiring that all suppliers and subcontractors confirm compliance with anti-slavery laws.
 - Reviewing supplier policies and practices to ensure alignment with our values.

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- Including anti-slavery clauses in contracts with all suppliers and business partners.
- Agency checks: We ensure that agencies supplying workers do not charge suspiciously low rates against standard industry pricing.
- Subcontractor checks: We have identified that due to the number of subcontractors that we engage at D&B, however, to mitigate risks of slavery and trafficking, we evaluate and check all subcontractors regarding their background and qualifications. Subcontractors go through the PPQ process prior to entering into contractors, and PPQ is reviewed every 3-5 years. All subcontractors are inducted on site with constant monitoring from the site manager. Where we engage consultants via a service company, we ensure that all relevant company checks are carried out.

7. Training

We provide ongoing training to employees and management, particularly in areas where the risk of modern slavery is high, such as fire stopping, to recognise and address potential indicators of forced labour and trafficking.

8. Reporting and Compliance

- Reporting Suspicions: Any employee or third party can report concerns or suspicions of modern slavery to the SHEQ Coordinator, ensuring confidentiality and protection for all reporters.
- Investigation: All reports of potential modern slavery cases will be investigated thoroughly, with appropriate actions taken if a violation is confirmed.
- Non-Retaliation: D&G Builders and Joiners Limited ensures that no retaliation will be taken against any individual who raises a concern regarding modern slavery or human trafficking in good faith.

9. Whistleblowing

Our Whistleblowing Policy is available from the Staff Handbook, and we encourage employees and partners to report any concerns related to modern slavery or human trafficking.

10. Monitoring and Review

We will regularly review this policy to assess its effectiveness and make improvements as necessary. Our review process includes:

- Annual assessment of our supply chain practices and policies.
- Periodic updates to training programs and supplier requirements.
- Tracking and analysing any cases or reports of modern slavery and actions taken.

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11. Compliance with Legislation

This policy is designed to comply with all applicable laws regarding anti-slavery and human trafficking, including the UK Modern Slavery Act 2015. Any breach of these laws by employees, suppliers, or business partners may lead to termination of contracts, disciplinary action, or legal proceedings.

12. Compliance with the Policy

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your manager as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If you believe or suspect a breach of this policy has occurred or that it may occur, you must inform your manager or a director or report it in accordance with our Whistleblowing Policy as soon as possible.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or a director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

13. Breaches of this policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy

Should any member of staff become aware of any breaches of this policy during the course of their employment, they should complete an 'Incident Form' and forward it to the SHEQ Co Ordinator within 48hrs of becoming aware of the incident


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14. Approval and Review Date

This policy has been approved by Board of Directors on 04th June 2025. It will be reviewed annually and updated as required to reflect changes in law or organizational practices.

Director: Mr. Andrew Ormerod

Signature: 

Date: 04/06/2025